


EXHIBIT D

From: John A. Curran Curran@gcglaw.com 
Subject: MURPHY, Shawn
Date: November 7, 2019 at 11:38 AM
To: Charles Teale cteale@tealelaw.com, rfojo@fojola.com
Cc: Marianne Kulacz kulacz@gcglaw.com

JC

11/7/19: Counsel: Attached please find correspondence that is also being mailed to you on this date. Thank you, John

John A. Curran, Esq.

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From: 2ndFICopyRm2@gcglaw.com <2ndFICopyRm2@gcglaw.com>

Sent: Thursday, November 7, 2019 11:31 AM

To: John A. Curran <Curran@gcglaw.com>

Subject: Message from KM_458



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November 7, 2019

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Re: Shawn Murphy

Dear Counsel:

I have received and acknowledge your demand package (letter and enclosed disc) dated November 1st. Unfortunately, the timing of the package and our disagreement as to the facts and the applicability of the cited law, as well as the amount of the demand, make it unproductive for us to consider a responsive offer at this time -- or the use of early ADR in this matter. I will be leaving on vacation (for 10 days) tomorrow, but would be happy to recommend and discuss waiver and acceptance of service of process for any federal litigation you may file (my handling of state waivers differs slightly), upon my return. Again, thank you for the recent letter and material. I remain,

Very truly yours,



John A. Curran

cc: Clients (email/pdf)